

Exhibit

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UNITED STATES DISTRICT COURT
FOR THE
WESTERN DISTRICT OF PENNSYLVANIA

SADRICK DONALDSON,
Plaintiff

V.

Civ. Action. No. 04-CV-257

UNITED STATES OF AMERICA
Defendant.

PLAINTIFF'S FIRST INTERROGATORIES DIRECTED TO
DEFENDANT WARDEN: JOHN J. LAMANNA, F.C.I. McKEAN

1. State your full name and job title.

Response: John J. LaManna
Warden

2. State the name and place of your employment.

Response: Federal Correctional Institution,
Edgefield, South Carolina

3. State in detail what your job details are.

Response: I am responsible for the overall supervision of the daily operations of the FCI Edgefield.

4. State if you ever have received, viewed and/or reported and/or investigated any reports regarding an inmate by the name of Sadrick Donaldson, No.# 20120-018, regarding an incident in which he received medical attention.

Response: I do not recall receiving, viewing and/or reporting and/or investigating any reports regarding an incident in which the Plaintiff received medical attention. As Warden at FCI McKean, I was not directly involved in any aspect of an investigation that may have occurred regarding an incident in which the Plaintiff required medical attention.

I signed a Request for Transfer Memorandum concerning the Plaintiff dated November 12, 2003, which summarized an incident of August 29, 2003, in which the Plaintiff was assaulted by another inmate with a cup of liquid. I have no personal knowledge of the facts underlying this summary.

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5. State in detail what the incident was about in regards to Inmate Sadrick Donaldson No. # 20120-018, and his medical treatment received at F.C.I. McKean on and about the year of 2003.

Response: I have no personal knowledge of any incident involving the Plaintiff or his medical care in 2003.

6. State and identify all Reports, Investigational -- Notes, Officer Reports, and S.I.S. Reports, Special Investigation Services, that have been submitted to your office by any agent and/or agency, that reported on any incident, regarding the injury and/or treatment medically for the inmate by the name of Sadrick Donaldson.

Response: I do not recall any such reports being submitted to my office, except that referenced in Response # 4.

7. State in detail and identify all reports and or notes that have been received by your office from any agents, and/or outside investigations regarding the incident in the year of 2003, regarding the plaintiff, Sadrick Donaldson, #20120-018, and his medical treatment received on or about the year of 2003.

Response: A SIS Report was prepared September 24, 2003, that would routinely have been provided to my office for review.

8. State in detail all and any information that you have regarding the plaintiff, Inmate Sadrick Donaldson, and his classification to any unit that is identified at F.C.I. McKean as "Protective Custody", if so, state and identify all documents reports and/or information regarding the placement of the plaintiff in such identified unit.

Response: I do not recall any information concerning the request of the Plaintiff to be placed in a "protective custody" (PC) unit at FCI McKean.

9. State if that in the year of 2003, you viewed and/or saw photos and or the plaintiff himself regarding an incident which he had been burned and/or injured by a chemical that had been thrown on him in an area of the F.C.I. McKean Prison, in the Education Dept area, in the year of 2003. If so, describe in detail what such photos and/or information you viewed regarding this incident.

Response: I do not recall viewing any photos or the Plaintiff himself.

10. State and identify any and all officers and/or counselors, and/or agents under your control that have submitted reports

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and/or notes regarding the incident of the injury of the plaintiff in the year of 2003.

Response: I have no specific knowledge of any staff members who might have submitted reports or notes regarding this incident, other than those detailed in the SIS Report dated September 24, 2003.

11. State in detail if the plaintiff had to be taken from the F.C.I. Prison McKean, to any Hospital and or emergency room regarding the injury that the plaintiff received in the Educational Building area at F.C.I. McKean on or about the year of 2003.

Response: I do recall that the Plaintiff was transported to an outside medical facility for treatment after being assaulted by another inmate in August 2003.

12. State in detail if the plaintiff Sadrick Donaldson #20120-018 had ever submitted any request to be placed under "Protective Custody" while at F.C.I. McKean. If your answer is yes, in detail state and identify all reports and or notes and the persons that made them in regards to your answer of this interrogatory.

Response: I am aware that there is a report dated December 2, 2002, indicating a request from the Plaintiff for Protective Custody, but I have no personal knowledge of the contents of that report. I was not involved in the writing or decisionmaking detailed in that document.

13. State the date in which the plaintiff was received at F.C.I. McKean.

Response: November 9, 2001

14. State in detail what, if any, reports were submitted to your office and/or to any agents under your control as employees regarding any so reported incidents regarding if another inmate at F.C.I. McKean, had threatened and/or had reported that the plaintiff would be in danger if specific inmates came into contact with the plaintiff in the years of 2002 to 2003.

Response: I have no personal knowledge of any such reports being submitted to my office or to the office of any of my former subordinates at FCI McKean.

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I declare that any and all records attached to this declaration are true and accurate copies maintained in the ordinary course of business by the Federal Bureau of Prisons. I further declare that the foregoing is true and correct to the best of my knowledge and belief, and is given under penalty of perjury pursuant to 28 U.S.C. §1746.



John J. La Manna
Warden

7-12-05
Date